


Michael Patrick Siano  
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**FILED**  
JEANNE A. NAUGHTON, CLERK  
APR 19 2023  
U.S. BANKRUPTCY COURT  
TRENTON, NJ  
BY  DEPUTY

UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEW JERSEY

IN RE:	)	Case No. 22-17381
Michael P. Siano Estate	)	
	)	Chapter 7
	)	NOTICE OF MOTION FOR
	)	VOLUNTARY DISMISSAL

Siano; Michael Patrick acting as agent for MICHAEL PATRICK SIANO now moves this court to dismiss the bankruptcy. Siano; Michael Patrick moves to dismiss because he feels the best interests for the MICHAEL PATRICK SIANO ESTATE are not best served in bankruptcy court. Monday April 10, 2023 at approximately 3:30 PM I found out that a hearing was held on April 4, 2023 after I was told by the clerks office that the matter of the 4<sup>th</sup> was going to be heard on the 11<sup>th</sup> of April by the Clerks office. At the hearing on April 4<sup>th</sup> it was decided that the exemption would be stricken from a vehicle in my possession. I can't blame the court for this ruling as I was not present, but this vehicle can not and should not have the exemption lifted. New Jersey Revised Statutes 2A:17-19 allows for a \$1000 exemption. 11 U.S.C. § 522(d)(2) allows for \$4,450 vehicle exemption, and the federal wild card exemption 11 U.S.C. § 522(d)(5) allows for \$13,950 in exemption to be applied as I would like. The total in exemptions amount to \$19,400.00.

This vehicle is a work vehicle and is used solely for work purposes. I make heavy duty jobsite deliveries for my job and the loss of this vehicle will not only irreparably harm me with the loss of my job, but it will cause harm to my employer as well with the loss of an employee. The Kelly blue book value of the vehicle is \$15,475.00, the value of the vehicle is well within the exemption limit of \$19,400.00.

There are six creditors with claims against the MICHAEL PATRICK SIANO ESTATE amounting to \$12,304.17. I have the funds available and wish to make payment in cash to them, I will write individual checks and send to each creditor what is claimed, or I will write one check and send it to the bankruptcy trustee Miss Isaacson, to be given to the creditors that way, whichever the court decides would be the best way to satisfy the creditors' claims.

Date: 4/14/2023

